

UNITED STATES DISTRICT COURT

for the
District of South Carolina

United States of America)

v.)

Joel T. Drogomir) Case No.

2:20-mj-101

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2, 2020 in the county of Charleston in the
Judicial District of South Carolina, the defendant(s) violated:

Code Section

49 U.S.C. § 46507

Offense Description

False Information and Threats

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Matthew Pirto, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/03/2020

Judge's signature

City and state: Charleston, South Carolina

Molly Cherry, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

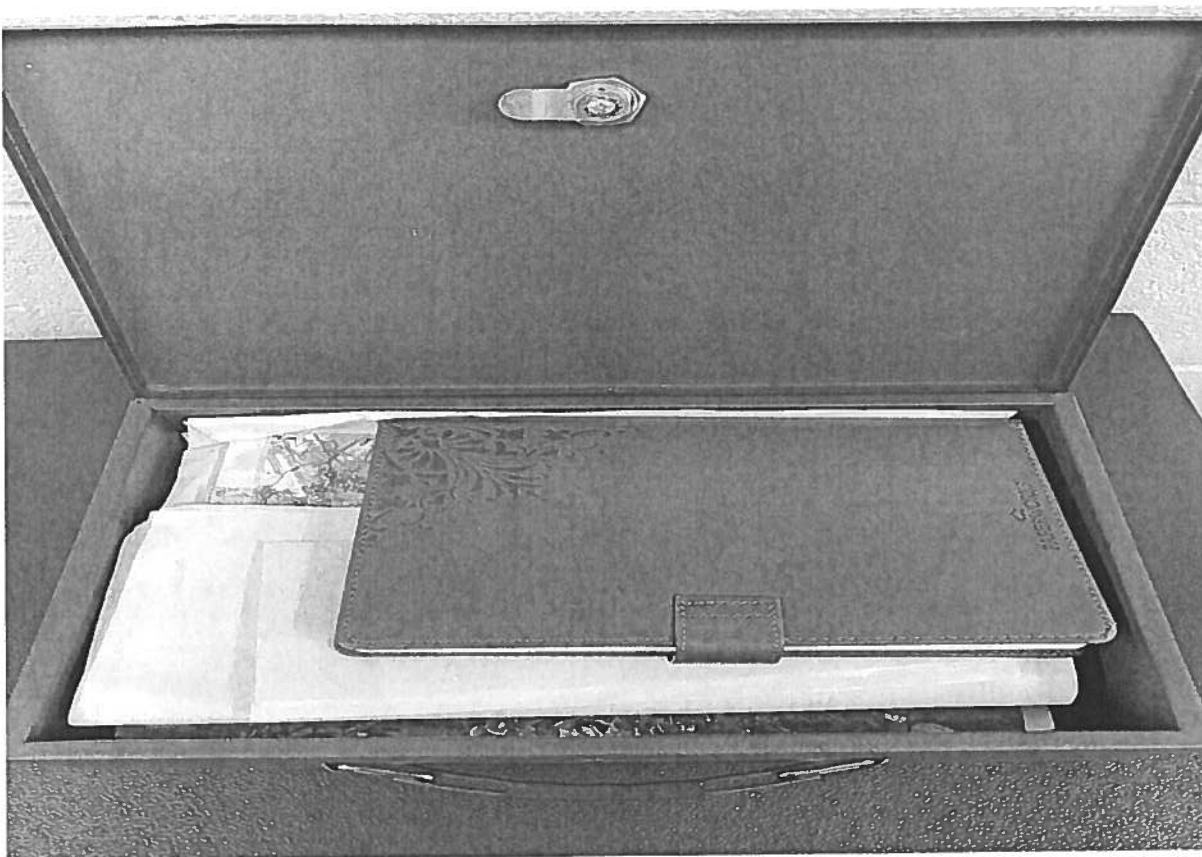
I, the Affiant, being duly sworn, depose and state that:

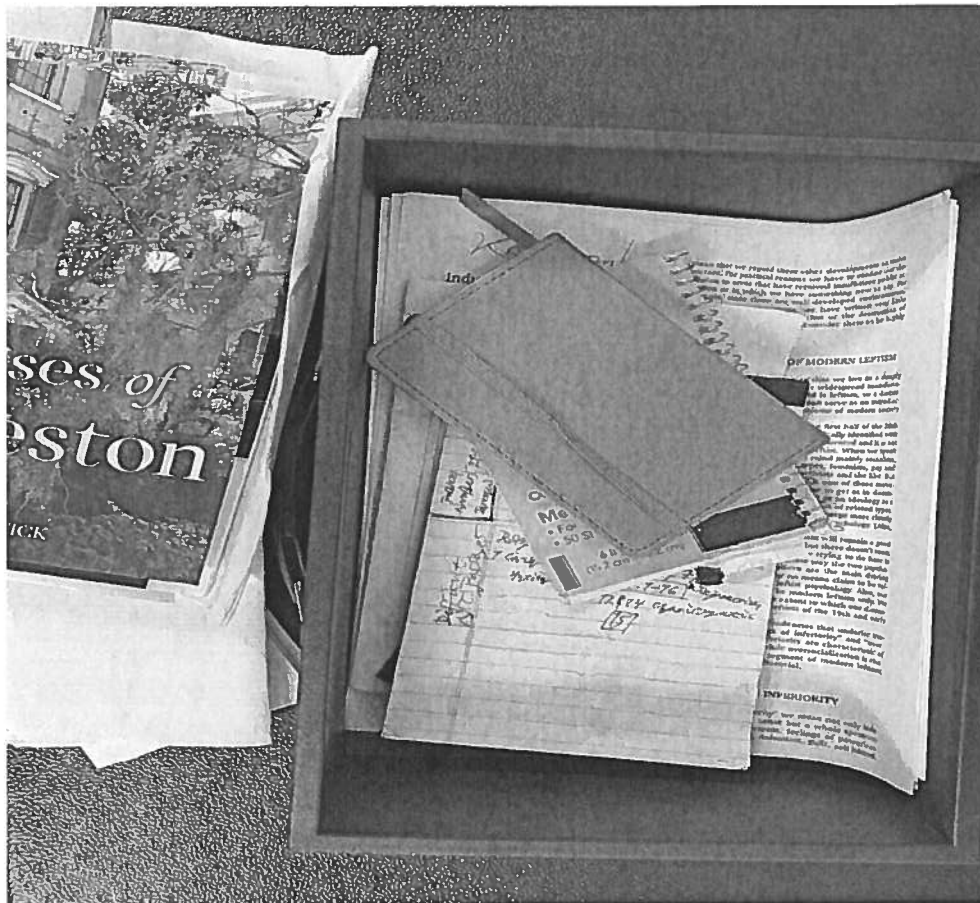
1. I am a Special Agent with the FBI and have been since August of 2008. I was first assigned to the New York City FBI Division in 2008, later assigned to the Critical Incident Response Group of the FBI, and finally assigned to the Charleston FBI Violent Crimes Task Force. My duties and responsibilities entail investigating violent gangs operating inside and outside the borders of the United States. As an FBI Agent, I have been trained in various aspects of law enforcement, particularly in general investigation techniques. As a result of my law enforcement experience, I have participated in numerous investigations. In connection with those investigations, I have conducted surveillance, executed searches, and secured relevant information using numerous other investigative techniques
2. As a result of my training and experience as an FBI Special Agent, I am familiar with federal criminal laws and know that the following is a violation of 49 U.S.C. § 46507. I am aware of the facts contained herein based upon my own investigation, as well as information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known by law enforcement concerning the incident outlined below.
3. This affidavit is made in support of my belief that on or about November 2, 2020, Joel T. Drogomir violated 49 U.S.C. § 46507, False Information and Threats, by telling a Transportation Security Administration Officer that he had a bomb in his bag.
4. The Charleston International Airport (“CHS”) is an international airport serving commercial airlines. The Transportation Security Administration (“TSA”) employs personnel at the CHS

who are charged with screening of passengers, baggage, equipment and cargo to ensure compliance with guidelines and regulations set by the U.S. Department of Homeland Security (“DHS”). The duties of a Transportation Security Officer (“TSO”) include, but are not limited to, checking luggage or packages manually or screening with x-ray equipment in order to identify hazardous items and keep them from being loaded or carried onto aircraft. TSOs report specific findings or incidents to management or law enforcement to help identify weaknesses in established protocol or flaws in terminal and equipment design.

5. On November 2, 2020, at approximately 9:00 a.m., Joel T. Drogomir (“Drogomir”) approached TSA checkpoint lane 6 at the CHS. After reclaiming his shoes from the x-ray machine, Drogomir removed a razor blade from his left shoe and asked the TSA agent why they did not find the razor blade during the screening process. The TSA agent confiscated the razor blade and advised Drogomir that he could not carry the razor blade onto the plane. Drogomir then asked why he was not arrested. Drogomir then said, “what if I tell you there is a bomb in my bag?” The TSA agent then asked if there was a bomb in his bag, and Drogomir stated, “yes, there is a bomb in my bag.”
6. At that point, Charleston County Aviation Authority Police Department (“CCAAPD”) officers apprehended Drogomir at TSA checkpoint lane 6 and seized his baggage.
7. The CCAAPD then transported Drogomir to their police station for questioning and isolated his backpack into the Total Containment Vessel (“TCV”) in preparation for inspection. The Charleston County Sheriff’s Office’s (“CCSO”) Bomb Squad later deemed the backpack cleared of any type of explosive device. CCAAPD officers determined that Drogomir checked two additional bags. Those bags were located in Charlotte and were cleared of any type of explosive device.

8. The FBI interviewed Drogomir at the CCAAPD. Drogomir advised the FBI that he intended to board American Airlines flight 5131 to Charlotte, NC, final destination of Cleveland, OH, where he intended to permanently remain with his mother. He then advised that he wanted to speak with his lawyer.
9. Drogomir was charged by the CCAAPD with Conveying False Information Regarding Attempted Use of a Destructive Device (SC Statute 16-23-750). He was released on a PR bond on November 2, 2020.
10. During a search incident to his arrest, the FBI and the CCAAPD searched Drogomir's backpack. In the backpack, they found a small, locked metal container, pictured below. The key to the container was in the locking mechanism. The contents of the container included several personal items and books, including a watch, batteries, and Theodore Kaczynski's manifesto, titled "Industrial Society and Its Future." "Kaboom!" was written above the manifesto's title.





Industrial Society and Its Future

Theodore Kaczynski

1995

INTRODUCTION

1. The Industrial Revolution and its consequences have been a disaster for the human race. They have greatly increased the life-expectancy of those of us who live in "advanced" countries, but they have destabilized society, have made life unfulfilling, have subjected human beings to indignities, have led to widespread psychological suffering (in the Third World to physical suffering as well) and have inflicted severe damage on the natural world. The continued development of technology will worsen the situation. It will certainly subject human being to greater indignities and inflict greater damage on the natural world, it will probably lead to greater social disruption and psychological suffering, and it may lead to increased physical suffering even in "advanced" countries.

2. The industrial-technological system may survive or it may break down. If it survives, it MAY eventually achieve a low level of physical and psychological suffering, but only after passing through a long and very painful period of adjustment and only at the cost of permanently reducing human beings and many other living organisms to engineered products and mere cogs in the social machine. Furthermore, if the system survives, the consequences will be inevitable: There is no way of reforming or modifying the system so as to prevent it from depriving people of dignity and autonomy.

3. If the system breaks down the consequences will still be very painful. But the bigger the system grows the more disastrous the results of its breakdown will be, so if it is to break down it had best break down sooner rather than later.

4. We therefore advocate a revolution against the industrial system. This revolution may or may not make use of violence; it may be sudden or it may be a relatively gradual process spanning a few decades. We can't predict any of that. But we do outline in a very general way the measures that those who hate the industrial system should take in order to prepare the way for a revolution against that form of society. This is not to be a POLITICAL revolution. Its object will be to overthrow not governments but the economic and technological basis of the present society.

5. In this article we give attention to only some of the negative developments that have grown out of the industrial-technological system. Other such developments we mention only briefly or ignore altogether. This does not

mean that we regard these other developments as unimportant. For practical reasons we have to confine our discussion to areas that have received insufficient public attention or in which we have something new to say. For example, since there are well-developed environmental and wilderness movements, we have written very little about environmental degradation or the destruction of wild nature, even though we consider these to be highly important.

THE PSYCHOLOGY OF MODERN LEFTISM

6. Almost everyone will agree that we live in a deeply troubled society. One of the most widespread manifestations of the craziness of our world is leftism, so a discussion of the psychology of leftism can serve as an introduction to the discussion of the problems of modern society in general.

7. But what is leftism? During the first half of the 20th century leftism could have been practically identified with socialism. Today the movement is fragmented and it is not clear who can properly be called a leftist. When we speak of leftists in this article we have in mind mainly socialists, collectivists, "politically correct" types, feminists, gay and disability activists, animal rights activists and the like. But not everyone who is associated with one of these movements is a leftist. What we are trying to get at in discussing leftism is not so much movement or an ideology as a psychological type, or rather a collection of related types. Thus, what we mean by "leftism" will emerge more clearly in the course of our discussion of leftist psychology. (Also, see paragraphs 227-230.)

8. Even so, our conception of leftism will remain a good deal less clear than we would wish, but there doesn't seem to be any remedy for this. All we are trying to do here is indicate in a rough and approximate way the two psychological tendencies that we believe are the main driving force of modern leftism. We by no means claim to be telling the WHOLE truth about leftist psychology. Also, our discussion is meant to apply to modern leftism only. We leave open the question of the extent to which our discussion could be applied to the leftists of the 19th and early 20th centuries.

9. The two psychological tendencies that underlie modern leftism we call "feelings of inferiority" and "oversocialization". Feelings of inferiority are characteristic of modern leftism as a whole, while oversocialization is characteristic only of a certain segment of modern leftism; but this segment is highly influential.

FEELINGS OF INFERIORITY

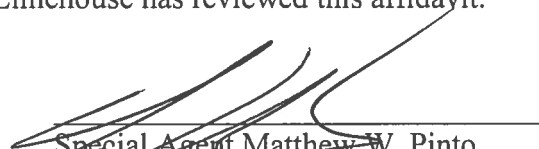
10. By "feelings of inferiority" we mean not only inferiority feelings in the strict sense but a whole spectrum of related traits; low self-esteem, feelings of powerlessness, depressive tendencies, defeatism, guilt, self-hatred,

11. Drogomir was born October 11, 1988. Drogomir does not have a criminal record.

12. Wherefore, based upon all of the information set forth in this Affidavit, I respectfully submit that there is probable cause to believe that on or about November 2, 2020, Joel T. Drogomir did violate 49 U.S.C. § 46507 by, knowing that the information was false, willfully and maliciously or with reckless disregard for the safety of human life, gave information about an alleged attempt to violate 49 U.S.C. § 46503, interfering with security screening personnel, and 49 U.S.C. § 46505, attempting to carry a weapon or explosive on an aircraft,

under circumstances in which the information reasonably may be believed. In consideration of the foregoing, I respectfully request that this Court issue a criminal complaint and arrest warrant for Joel T. Drogomir.

Assistant United States Attorney Emily Limehouse has reviewed this affidavit.


Special Agent Matthew W. Pinto
Federal Bureau of Investigations

Sworn to and subscribed before me this 3rd day of November, 2020.


The Honorable Molly Cherry
United States Magistrate Judge